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Counsel for Tourboullin Co.

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
(RICHMOND DIVISION)

IN RE:)	
)	
CIRCUIT CITY STORES, INC. ET AL.)	Chapter 11
)	
)	Case No. 08-35653 (KRH)
Debtors.)	Jointly Administered

OBJECTION BY TOURBOULLIN CO.
TO PROPOSED CURE AMOUNT

Store# 365, Holbrook, New York

Tourboullin Co. (the “Lessor”), by its undersigned counsel, objects to the proposed cure amount set forth on “Exhibit B” Cure Amounts By Store (the “Cure Exhibit”) to the Debtors’ Motion for Orders under 11 U.S.C. §§ 105, 363 and 365 (I) Approving Bidding and Auction

Procedures for Sale of Unexpired Nonresidential Real Property Leases for Closing Stores, (II) Setting Sale Hearing Date, and (III) Authorizing and Approving (A) Sale of Certain Nonresidential Real Property Leases Free and Clear of Liens, Claims and Encumbrances, (B) Assumption and Assignment of Certain Unexpired Nonresidential Real Property Leases, and () Lease Rejection Procedures (the "Motion") filed by the debtors and debtors in possession in the above-captioned jointly administered cases (collectively, the "Debtors"), and states as follows:

1. The Lessor leases "Store #3685" (with an address of 7001 Sunrise Highway, Holbrook, New York) to Circuit City Stores, Inc. (the "Lessee Debtor").
2. In the Cure Exhibit, the Debtors state that the "cure amount" for the Store 3685 Lease is \$13,610.00.
3. The Debtors' statement of the "cure amount" is not correct. Subject to the reservation set forth in paragraph 4 hereof, the correct "cure amount" with respect to the Store 3685 Lease is not less than \$45,906.14 as December 15, 2008, based on the following computation.

A.	Pre-petition Rent (11/1/08-11/9/08)	\$10,422.37
B.	Unpaid taxes (pre-petition period)	\$3,349.47
C.	Post Petition taxes (11/10/08-11/30/08)	\$7,815.42
D.	Additional Post Petition taxes (2008/2009)	\$139,628.64

TOTAL CURE AMOUNT

\$161,215.90

4. The correct "cure amount" is based on the best information now available to the Lessor and its advisors and is set forth with the Lessor's full reservation of right to modify such "cure amount" as such additional information becomes available to the Lessor. The "cure amount" does not include such additional items as attorneys' fees, interest, repair and maintenance costs, indemnification obligations, other claim against the Lessee Debtor under the

Store 3685 Lease, and actual pecuniary losses suffered by the Lessor that result from the Lessee Debtor's defaults under the Store 3685 Lease. The Lessor expressly reserves the right to increase the "cure amount" to include those and other items at such time as they materialize and/or may be computed.

5. The Lessor hereby reserves all of its rights to remedies, including but not limited to the right to object to any proposed assumption of the Store 3685 Lease.

WHEREFORE, the Lessor objects to the Debtors' statement of the "cure amount" and respectfully requests that the Court fix the "cure amount" (subject to reservations above) for the Store 3685 Lease as set forth above and grant such other and further relief as is appropriate.

Dated: December 17, 2008

CHRISTIAN & BARTON, LLP

By: /s/ Jennifer M. McLemore
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CERTIFICATE OF SERVICE

I hereby certify that on the 17th day of December, 2008, I caused a copy of the foregoing to be served by electronic means on the “2002” and “Core” lists and through the ECF system.

/s/ Jennifer M. McLemore

Jennifer M. McLemore

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